

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

ANDREW R. MAY, On Behalf of Himself and : Civil Action No. 1:07-cv-04819-CM
All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
TELIK, INC., et al., :
Defendants. :
KEVIN HENNESSY, Individually and On : Civil Action No. 1:07-cv-05707-CM
Behalf of All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
TELIK, INC., et al., :
Defendants. :

x

MEMORANDUM IN FURTHER SUPPORT OF THE MOTION OF ELECTRICAL
WORKERS PENSION FUND, LOCAL 103, I.B.E.W. FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF LEAD
COUNSEL AND IN RESPONSE TO THE COMPETING MOTIONS

Institutional Investor Electrical Workers Pension Fund, Local 103, I.B.E.W. (the “Electrical Workers Pension Fund”) respectfully submits this memorandum of law in further support of its Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of its Selection of Lead Counsel and in response to the competing motions.

Based upon a review of the lead plaintiff motions, it appears that there are other movants who claim to have a larger financial interest than the Electrical Workers Pension Fund. In recognition of this, the Electrical Workers Pension Fund respectfully submits that it is ready, willing and able to serve as Lead Plaintiff should the Court determine that the other movants are inadequate or atypical to lead this litigation on behalf of the Class.

Finally, it should be noted that the Electrical Workers Pension Fund is the only lead plaintiff movant who purchased shares of Telik, Inc. common stock directly in the Company’s January 28, 2005 public offering. Should the Court-appointed Lead Plaintiff fail to name a class representative to preserve the Securities Act of 1933 claims of purchasers in the January 28, 2005 public offering by the time of the filing of Lead Plaintiff’s Amended Complaint, the Electrical Workers Pension Fund would seek at that time to intervene as a class representative.

DATED: August 20, 2007

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/s/ Mario Alba, Jr.
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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on August 20, 2007, I caused a true and correct copy of the attached:

Memorandum In Further Support Of The Motion Of Electrical Workers Pension Fund, Local 103, I.B.E.W. For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel And In Response To The Competing Motions

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ *Mario Alba Jr.*

Mario Alba Jr.

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Service List - 8/20/2007 (07-0128)

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